

1 Jorge Alejandro Rojas
2 Rojas.jorge96@gmail.com
3 Plaintiff in Pro Se
4 557 Cambridge Way
5 Bolingbrook, IL 60440
6 424-219-1582
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10

11 JORGE ALEJANDRO ROJAS,
12 Plaintiff,
13 v.
14 UNPLUGGED MEDIA, LLC, and
15 ALEXANDER BYKHOVSKY,
16 Defendants.
17

Case No. 2:23-cv-02667-SPG-KS

District Judge Sherilyn Peace Garnett
Magistrate Judge Karen L. Stevenson

**NOTICE OF LODGING OF
PROPOSED SECOND AMENDED
COMPLAINT**

18 Plaintiff, Jorge Alejandro Rojas, lodges a proposed copy of the Second Amended
19 Complaint. Exhibit 1 to this filing is a “clean” version of the proposed Second Amended
20 Complaint. Exhibit 2 to this filing is a “red lined” version of the proposed Second Amended
21 Complaint, and identifies the changes between the operative complaint and the Second
22 Amended Complaint.

23 Plaintiff believes this proposed Second Amended Complaint addresses the
24 deficiencies the Court found (Dkt. 56) in the earlier proposed Second Amended Complaint.
25 The changes made relate to demonstrating ALEXANDER BYKHOVSKY’s involvement
26 in the alleged telemarketing scheme as well as a change to the status of one of the corporate
27 entities being sued – a change in status which occurred following the first proposed filing.
28 Some of the more substantive additions include paragraphs 49-53, and 212-232.

1 Respectfully submitted,

2 Dated: August 2, 2024

3 */s/ Jorge Alejandro Rojas*
4 JORGE ALEJANDRO ROJAS
5 Rojas.jorge96@gmail.com
6 Plaintiff in Pro Se
7 557 Cambridge Way
8 Bolingbrook, IL 60440
9 (424) 219-1582

8 **CERTIFICATE OF SERVICE**

9 A copy of this filing is being sent to the last known address for Defendants on the
10 day of filing of this document via mail.

11 */s/ Jorge Alejandro Rojas*
12 JORGE ALEJANDRO ROJAS
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